

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. 4:16 CR 318 RWS NCC
	)	
DARRIN LANDES	)	
	)	
Defendant.	)	

**MOTION FOR PRE-TRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Anthony L. Franks, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. Defendant is charged with Wire Fraud in violation of Title 18, United States Code, Section 1343.
2. Pursuant to Title 18, United States Code, Section 3142(g)
  - (a) the weight of the evidence against defendant;
  - (b) defendant's history and characteristics, including that defendant is currently on supervised release under case no. 4:13CR450JAR for offenses almost identical in kind to the

wire fraud charge in this indictment and defendant continues to violate the law and victimize the public; and

(c) the nature and seriousness of the danger to any person or the community that would be posed by defendant's release warrant defendant's detention pending trial.

3. There is a serious risk that the defendant will flee.

4. The defendant is a threat to the community.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community and the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

RICHARD G. CALLAHAN  
UNITED STATES ATTORNEY

/s/ Anthony L. Franks  
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